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March 24, 2025

**Hon. Elizabeth S. Stong  
U.S. Bankruptcy Court,  
Eastern District of New York  
271-C Cadman Plaza East  
Brooklyn, NY 11201-1800**

Case Name: Rosemarie Lopa  
Case Number: 1-23-42457-ess

Dear Honorable Judge Elizabeth S. Stong,

Our office disagrees with and objects to the entry of the affidavit of non-compliance and the consent order lifting the automatic stay for the following reasons: The proposed order's terms state that the certification of non-compliance will be filed after a ten (10) days written notice of default to the attorney for the debtor. Notice of default was given by the creditor's counsel on March 18, 2025. Ten days from that date have not yet elapsed. Therefore, the affidavit of non-compliance cannot be filed until March 28, 2025, unless and until payment is not made and the default is not cured.

Sincerely,

/s/ Alla Kachan, Esq.

Alla Kachan, Esq.